

# **EXHIBIT C**

DECLARATION OF ADAM CHARLES BRADEN

I, ADAM CHARLES BRADEN, declare as follows:

1. I have been working in the cable industry for almost 12 years.
2. I began working for AT&T in 2000 as a basic installer. About eight or nine years ago, Comcast purchased AT&T and I began working for Comcast as a Comm Tech 3. About six years or so ago, I passed a written test and trained to become an NCT 4.
3. I have always worked out of Comcast's Waukegan facility. The Waukegan facility is located at 1585 Waukegan Road, Waukegan, Illinois, 60085.
4. My main duty as an NCT 4 is to maintain the Comcast plant on a day-to-day basis. This may involve anything from handling outages, picking up line calls, or fixing anything that I find wrong in the areas that I cover. The other thirteen technicians that I work with and I have split our area up into 3 zones – North, South, and West. The nodes that I monitor are in the South, and include Lake Forest and Lake Bluff.
5. I currently work from Tuesday through Saturday. On Tuesdays through Fridays, I am scheduled to work from 6:30 a.m. until 3:30 p.m. and, on Saturday, I am scheduled to work from 7:00 a.m. until 4 p.m.
6. I have been home-garaged for the last 9 to 12 months or so. As a home-garage technician, I leave directly from my home in the morning to my first job of the day. I understand that the purpose of home-garaging is to put the technicians closer to the first job at the start of the day.
7. Before I was home-garaged, I would come into the Waukegan office every morning at 6:30 a.m. When we would come in the morning, we would basically come in and B.S. for half an hour. Our supervisor would give us our first assignments and would try to evenly disperse them among the technicians that were there. Our general rules of thumb were to get the jobs

done in the order that they came in. However, if we were given multiple jobs, we used our discretion as to what jobs we would do and in what order so that we could get everything taken care of in a reasonable amount of time. For example, we might start with the jobs that were closer to the office even if it was not the oldest job.

8. On the days when I would arrive in the office at 6:30 a.m., I would not even log on to Watchtower until I left our daily meeting and went back out to my truck. I would start the truck and turn on the laptop around 7:00 a.m. On occasion, if there was an outage, I wouldn't go into the office in the morning and I would go directly to the outage instead.

9. Now that I am home-garaged, I start my truck and log into my laptop between at the start of my shift. Before I start my truck, I do a quick "walkaround" of my truck every day and check that the lights are working, the windshield isn't broken, the backup horn works, among others. This is a Department of Transportation requirement and usually takes about a minute or two to do. We fill out sheets daily and turn those in at the end of the month.

10. When I log into WatchTower, I pick the jobs that I am going to start my day with. Usually, I will look at anything that has been put in WatchTower for my area. I will assign myself jobs in the order that they have been called in – the oldest job goes to the top of the pile. If there is nothing in my zone, I will call the other three technicians in and see whether there is anything in their zones that they weren't able to pick up right away. I also check to see if there are any jobs or areas that are really backed up. For instance, on Saturdays, there are less people that are working, so I may go up North or South to make sure that everything is balanced.

11. There are also a lot of times when I will create a job in Watchtower for myself. I will look at how the market is running in my area and see whether I need to create a job in WatchTower to address any node health issues. Sometimes, I will look at the market and see

what's wrong and need to go and correct something, such as when electronic noise that has gotten into the system and is slowing the internet down.

12. My supervisor is minimally involved in assigning us work for the day. We are expected to maintain our areas.

13. The number of jobs that I will do in a day varies. I have spent entire days on one job – like when something has to be dug up and I have to dig a big hole – and other times I will be able to complete 5 to 6 jobs in a day.

14. I am supposed to be on my first job by 7:15 a.m. If there is traffic, it might take me a little longer to arrive at my first job. In those situations, I will likely call my supervisor to tell him what's going on. I've never had anyone come down on me if I have been late getting to a site because of traffic.

15. I am entitled to an hour lunch break and I am expected to take it. I always take my lunch break. I usually take my break between 11:00 a.m. and 1:15 p.m., depending on whenever I can finish up whatever I am working on. If I'm working on an outage, I will work until there is a break point and I can get someone to cover it. When I eat my lunch, I almost always sit in my truck and read. If it's nice outside, I will sit on my truck bumper in the sun. When I'm at lunch, I don't respond to emails, phone calls or text messages. If I hear a page come through on my phone, I will sometimes glance at it for a few seconds and silence the phone. I will then look at the text when I am done with my lunch break.

16. On a handful of occasions in the last few years, I have not been able to take my lunch break as scheduled. I have taken my lunch at the end of the day and essentially left an hour early. This has probably only happened twice, such as when we had bad outages with the big storms last year. On those occasions, I called my supervisor and told him that I hadn't taken my

lunch. I left an hour before my shift was supposed to end. I have never been forced to work though my lunch without getting paid for it.

17. Before I was home-garaged, I would return to the Comcast Waukegan office at the end of the day. I used to come back between 3:15 p.m. and 3:30 p.m. We would sit around the back and talk with the other techs, joke around and make fun of people. It wasn't usually work-related. Now, I leave the worksite at or just before 3:30 p.m. to go home.

18. If I have a job that is running over and may require work to be done after the end of my shift, I will call my supervisor and let him know that I have an outage that needs to be completed. My supervisor will either say "stop" and tell me that he will send the late guy or the on-call guy, or he will say go ahead and take care of it and log it the time as overtime for the day. We have generally been slow lately, so this has not happened very often.

19. When I go home for the day, I turn the volume off on my phone unless I am on call. I don't respond to emails or phone calls.

20. I am on-call for one week then off for three weeks. My on-call shift usually begins around 6:30 p.m. because our office has a set of technicians whose shift goes until 7:00 p.m. So, I have time from 3:30 p.m. (when my shift ends) until 6:30 p.m. when I am not on-call.

21. When I am on call, I leave my phone on. Other than that, I can go about my business. Being on-call doesn't stop me from going to my friends' houses to say hi, going out to dinner, or from doing anything, really.

22. As far as I know, there is no specific timeline for responding to the on-call pages and getting the job done. I try to answer the page and log onto WatchTower to assign myself the job as quickly as possible. Then, I roll out to the job. The time it takes to get to a job varies and depends on the distance. There was a time in the blizzard two years ago when it took me almost

3 hours to drive the twelve miles to answer a call. I've never been called out and had the job take less than two hours.

23. I have received training on how to use ESS. We took a course when it was first being rolled out.

24. I always put in my own time. I don't think that anyone else is able to put in time for me. When I was in the hospital once, one of the other techs brought me my laptop so I could enter my leave because I have always understood that I am the only one who can enter my time. I put in my time on a daily basis and usually do it at the end of the day before leaving the job site. Every once in awhile, I will forget and enter my time the following day. In those cases, my supervisor will remind me to put in my time. I estimate that I have it in on a daily basis about 99.9% of the time. My supervisor can approve or reject my time, but he cannot change it.

25. Since I have been home-garaged, we have a weekly meeting on Wednesday morning. The meeting typically last for 45 minutes to 1 hour. We will cover common issues that have come up in our areas, safety briefings, trainings and generally get to know each other. After the Wednesday meeting, I will clean my truck and complete my vehicle checklist. The checklist involves a more detailed safety check of the truck and covers interior cleanliness, making sure our safety equipment is all in working order, the lights are working, etc.

26. I have never complained that I haven't been paid for all time worked and I have never had an issue getting paid for any overtime that I worked

27. I understand that this declaration is being provided in connection with two lawsuits brought against Comcast by current and former employees who claim that they have not been paid for all time worked in violation of federal and state law. I understand that the plaintiffs are seeking to represent current and former technicians at Comcast in Illinois, including me, in a

class action lawsuit. I also understand that I may be invited to join the lawsuit as a plaintiff and I would be eligible to participate as a member of the class if the case is certified. I also understand that the lawyer who interviewed me and prepared this declaration for me represents Comcast and does not represent me.

28. What I say in this declaration is the truth. I am providing this statement voluntarily and without any duress, threats, intimidation or coercion. I understand that I did not have to give this declaration, that I can provide or refuse to provide a declaration or testimony, and I know that providing this declaration is not a condition of my employment with Comcast. I attest to the information in this declaration voluntarily and of my own free will.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed on this 10day of July, 2012 in Waukegan, Illinois.



Adam Charles Braden